



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 18, 2015

Georgia Anastasiou
Agent for Combat Insect Control Systems
Combact Insect Control Systems
c/o Lewis & Harrison
122 C Street, NW, Suite 505
Washington, D.C. 20001

Subject: Label Amendment – Adding additional directions for cleaning and deodorizing. Modifying the current direction to allow the nozzle to be set to “Stream” or “Spray”.
Adding use areas “glass” and “chrome” Plus minor revisions to the marketing language.
Product Name: WC Complete
EPA Registration Number: 64240-65
Application Date: November 04, 2014
Decision Number: 497529

Dear Ms. Anastasiou:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website

contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Lorena Rivas by phone at 703-305-5027 number, or via email at rivas.lorena@epa.gov.

Sincerely,



Jacqueline Hardy, Product Manager
Team 34
Regulatory Management Branch II
Antimicrobials Division (7510P)

Enclosure: Stamped Label

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***

Highlighted text is new

[Bracketed information is optional or alternative text.]

~~Strikethrough~~ indicates deleted text

MASTER LABEL

EPA Reg. No. 64240-65

WC Complete November 4, 2014

Pg 1 of 9

Front Panel Language

WC Complete

ACCEPTED

02/18/2015

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 64240-65

Approved Alternate Brand Names:

Soft Scrub Total Brand Bath and Bowl (*approved on 3/9/10*)

Soft Scrub Total Brand Bath and [&] Bowl Fresh Scent (*approved on 3/9/10*)

Ingredient Statement

ACTIVE INGREDIENT: Lactic Acid 4.0%

OTHER INGREDIENTS: 96.0%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION: Causes moderate eye irritation

Read back panel carefully

Net Contents: _____

EPA Reg. No. 64240-65

EPA Est. No. _____

[Beginning of Batch Code indicates EPA Est. No.]

Precautionary Language

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

FIRST AID: If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information [on WC Complete] call [SafetyCall International at] 1-866-338-8517[, 24h/day, seven days a week].

Physical or Chemical Hazards: Contains lactic acid. Do not mix with chlorine bleach or other household chemicals, as hazardous gases may be released.

Storage and Disposal Language

Note to Reviewer: Household/Residential Storage Disposal Statements

Storage & Disposal

Store in cool, well-ventilated area inaccessible to small children and pets. Non-refillable container. Do not re-use or refill this container. Offer for recycling if available or discard in trash.

Note to Reviewer: All uses other than Household/Residential Storage Disposal Statements

Storage & Disposal

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in a cool, well-ventilated area inaccessible to small children and pets.

Pesticide Disposal: To avoid wastes, use all material in this container by application according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available or discard in trash.

Batch Code Information

{Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The number will be laser-coded on the primary package.}

Directions for Use

DIRECTIONS FOR USE: It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Usage Areas: [Use around [your] [the] house to clean [even] tough stains and build up]. Use on hard, nonporous surfaces [such as plastic laminate, sealed granite, cultured marble, stainless steel, glass, chrome, and glazed porcelain]. [Works great on] sinks, bathtubs, shower doors, glazed tile, toilet bowls, glass, chrome, faucets and fixtures. For other surfaces, spot test in an inconspicuous area. Not recommended for use on natural stone, copper and brass. Avoid contact with wood, fabric, vinyl, painted surfaces and wallpaper.

To clean and deodorize:

[1] Choose SPRAY or FOAM

- **Spray:** [Open flip tab on end of nozzle] [Open screen] [and rotate to "SPRAY"]
For lighter spot cleaning or larger surface areas
[graphic depiction of the nozzle in SPRAY position]
- **Foam:** [Close flip tab on end of nozzle] [Close screen] [and rotate to FOAM]
For heavier cleaning or more focused surface areas
[graphic depiction of the nozzle in FOAM position]

[2] Spray [or apply foam] 6-8 inches from surface.

[3] Wipe thoroughly with a clean, damp cloth or sponge.

[4] For heavily soiled areas, let product stand several minutes then wipe and rinse with water (if needed).

[5] [To get at hard to reach areas like under the toilet rim, invert bottle for optimal cleaning.]

[5]-~~or~~-[6] Rotate nozzle to STOP position after use.

-OR-

To clean and deodorize:

[1] Rotate nozzle to stream or spray.

[2] For a wider spray pattern press the trigger quickly and release. For a stream pattern pull the trigger back more slowly.

[3] Spray 6-8 inches from surface.

[4] Wipe thoroughly with a clean, damp cloth or sponge.

[5] For heavily soiled areas, let product stand several minutes then wipe and rinse with water (if needed).

[6] Rotate nozzle to off position after use.

To disinfect hard non-porous surfaces: Apply product [by spray or [foam] [stream]] and leave on surface for 10 minutes before wiping clean. Heavily soiled surfaces must be pre-cleaned prior to disinfecting.

To sanitize hard non-porous surfaces: Apply product [by spray or [foam] [stream]] and leave on surface for 30 seconds before wiping clean. Pre-clean surfaces prior to sanitizing.

To clean inside toilet bowl: Set to [FOAM] [spray] and [invert bottle to] spray sides and under rim of toilet bowl. Let stand for several minutes, then brush and flush. Heavily soiled surfaces must be pre-cleaned prior to disinfecting.

To disinfect inside toilet bowl: Empty water from toilet. Set to [FOAM] [spray] and [invert bottle to] spray sides and under rim of toilet bowl. Let stand for 10 minutes, then brush and flush. Heavily soiled surfaces must be pre-cleaned prior to disinfecting.

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Highlighted text is new

[Bracketed information is optional or alternative text.]

~~Strikethrough indicates deleted text~~

MASTER LABEL

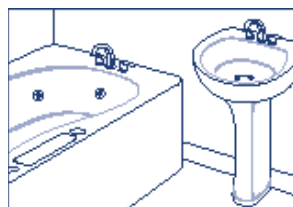
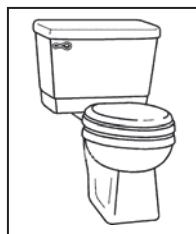
EPA Reg. No. 64240-65

WC Complete November 4, 2014

Pg 4 of 9

OPTIONAL GRAPHICS Illustration of suggested use areas.

Graphics below are representative of, but not necessarily exact depictions of, figures for the final label.



Optional Henkel Business Language (front or back panels)



-or-



-or-



[UPC bar code]

[The distinctive design and elements of this package are proprietary and owned by:]

© [year] Distributed by [Combat Insect Control Systems] [The Dial Corporation, A Henkel Company]

[7201 E. Henkel Way] SCOTTSDALE, [AZ] [Arizona] 85255

MADE IN THE U.S.A.

Questions [or comments]? Call 1-800-290-0158

[Or] visit [us at] www.softscrub.com

[Also try...]

[Try our [other] [family of] Soft Scrub products[!]]

OPTIONAL GRAPHICS – Pictures and names of other Dial products in the Soft Scrub line.



Advanced Surface
[Cleaner & Polish]



Mold and Mildew
Stain Remover



All Purpose
Cleaner



All Purpose Cleaner
with Bleach

Optional Disinfecting/Sanitizing Claims for front or back panel

1. Antibacterial Cleanser
2. Antibacterial [Action]
3. [Disinfectant] [Disinfects]
4. [Bathroom] [Multi-Purpose] Disinfectant
5. Disinfects [and] [&] deodorizes
6. Eliminates [Wipes Out] Odors Caused By [Bacteria]
7. Kills [Odor-Causing] Bacteria
8. Hospital Disinfectant Cleaner [Cleanser]
9. Industrial Disinfectant Cleaner [Cleanser]
10. Institutional Disinfectant Cleaner [Cleanser]
11. Healthcare Disinfectant Cleaner [Cleanser]
12. Disinfecting [Cleaner] [Cleanser]
13. [Home] [Bathroom] [Multi-Purpose] Disinfectant [Cleanser]
14. Bactericide [Bactericidal]
15. Germicide [Germicidal]
16. Virucide [Virucidal]
17. Cleans [And] [&] Disinfects
18. Cleans [and] [&] Disinfects All Bathroom Surfaces** [Even Inside Toilets]
**Hard Non-Porous Surfaces
19. Cleans [And] [&] Disinfects All Bathroom Hard Non-Porous Surfaces [Even Inside Toilets]
20. Cleans [and] [&] disinfects [your] bathroom [!]
21. Leaves Surfaces Sanitary
22. Sanitizes [All Bathroom] Hard Non-Porous Surfaces [Even Inside Toilets]
23. Sanitizer
24. [Fights] [Removes] Mold and Mildew
25. Inhibits [the] [Growth of] Mold and Mildew
26. Disinfects [and] [&] Deodorizes [by Killing Germs* and Their Odors]
* Kills [Salmonella enterica] [Escherichia coli] [Shigella sonnei] [Staphylococcus aureus] [Pseudomonas aeruginosa] [Rhinovirus] [and] [Influenza A [virus]]
27. Kills Toilet Germs*
* Kills [Salmonella enterica] [Escherichia coli] [Shigella sonnei] [and] [Rotavirus]
28. [Sanitizes surfaces in 30 seconds.] Kills [bacteria] **~~–or–~~** [99.9% of] [common] [household] germs*
* [Kills] [Salmonella enterica] [Escherichia coli] [Shigella sonnei] [Staphylococcus aureus] [and] [Pseudomonas aeruginosa] [in 10 minutes] [at full strength] [and] [Influenza A [Virus]] [Rotavirus] [Rhinovirus [Type 39]] [In 30 Seconds] [at full strength]
29. Kills [99.9% of] Salmonella enterica [ATCC 10708] [(Salmonella)] [in 10 minutes] [at full strength]
30. Kills [99.9% of] Pseudomonas aeruginosa [ATCC 15442] [(Pseudomonas)] [in 10 minutes] [at full strength]

Optional Disinfecting/Sanitizing Claims for front or back panel (Continued)

31. [Sanitizes surfaces in 30 seconds.] Kills [99.9% of] Staphylococcus aureus [ATCC 6538] [(Staph)] [in 10 minutes] [at full strength]
32. [Sanitizes surfaces in 30 seconds.] Kills 99.9% of Enterobacter aerogenes [ATCC 13048] [in 30 seconds] [at full strength]
33. [Sanitizes surfaces in 30 seconds.] Kills [99.9% of] Shigella sonnei [ATCC 25931] [in 30 seconds] [at full strength]
34. [Sanitizes surfaces in 30 seconds.] Kills [99.9% of] Escherichia coli [ATCC 11229] [in 30 seconds] [at full strength]
35. Kills Influenza A [Virus] [In 30 Seconds]
36. Kills Rotavirus [In 30 Seconds]
37. Kills Rhinovirus [Type 39] [In 30 Seconds]
38. Kills [flu] virus[es]* [in 30 seconds] *Kills Influenza A [virus]
39. Kills [flu] virus[es]* *Kills Influenza A [virus] [n 30 seconds]
40. Kills [cold] [and] [&] [flu] virus[es]* [in 30 seconds] *Kills Influenza A [virus] and Rhinovirus
41. Kills [cold] [and] [&] [flu] virus[es]* *Kills Influenza A [virus] and Rhinovirus [in 30 seconds]
42. [Respiratory illnesses attributable to Pandemic 2009 H1N1 are caused by influenza A virus. [This-product] **[-OR- ACCEPTED ABM]** is a broad-spectrum hard surface disinfectant that has been shown to be effective against influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu).]
43. [[This product] **[-OR- ACCEPTED ABM]** has demonstrated effectiveness against influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 influenza A virus.]
44. [[This product] **[-OR- ACCEPTED ABM]** has demonstrated effectiveness against influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu).]
45. [Kills Pandemic 2009 H1N1 influenza A virus (formerly called swine flu).]
46. [Kills Pandemic 2009 H1N1 influenza A virus.]

Optional General / Cleaning Claims for front or back panel

47. [Bathroom] [Multi-Room] [Multi Purpose] [Multi-Surface] [Cleanser] [Cleaner]
48. Cleans [& Deodorizes] [Your] [the] Bathroom – Even [Inside] [The] Toilet[s]
49. Commercial
50. Custodian / Custodial
51. Industrial
52. Institutional
53. Residential
54. Food Service
55. [Henkel Consumer Goods Inc.] [Henkel] [Commercial] [Products] [Series]
56. Tough Cleaning [Action] [Power]

-
57. [Great] [Good] For Heavy Duty Cleaning
58. Your Complete Bathroom [Caddy] [Arsenal] [In One Product]
59. [Trigger] [Even] [Sprays] [Works] [Upside Down] [Sideways]
- [May include illustration/graphic depiction of the container shown upside down.]***
60. Sprays [A Thick Foam] [And] [&] [A Fine Mist]
61. [Powerful] Foaming Action
62. Sprays 360 Degrees
63. Thick Foam Clings To [Toilet Bowl] [Sides Of Toilet] [Shower Walls] [Tubs]
64. Strong Enough For Your Toilet
65. One Product, [Multiple] [Many] Uses
66. [Has] [A] [Clean] [Pleasant] [Fresh] [Scent] [Fragrance]
67. Easy To Use Trigger
68. The Ultimate Clean
69. A Clean You Can [Trust] [See And Feel]
70. Deodorizes
71. Makes cleaning [the] [your] [bathroom] [home] easier
72. Saves Time When Cleaning
73. Cleans [Your Bathroom Inside And Out] [To The Nth Degree]
74. Totally Rethink Clean
75. Fresh Scent
76. Foam or Spray
77. Foam (Closed Screen)
78. Spray (Open Screen)
79. [Tough on Stains] [and] [&] [Gentle on Surfaces] [!]
80. New Look [!]
81. [Use] [great] [WC Complete or approved ABN] [for] [to] [clean][s][ing] [remove][s]
[removing] [fights] [tough] [on]
- a. Bathroom [Soil][s] [Dirt]
 - b. Bathtub[s] [Ring]s]
 - c. Calcium
 - d. [Fingerprints] [Or] [and] [&] [Smudges]
 - e. General Household [Dirt] [Soil][s]
 - f. Outdoor [dirt] [soil][s]
 - g. [Tough] [dirt] [soils] [stains]
 - h. [Tough] [Greasy] Dirt
 - i. [Tough] [Grease] [And] [&] [Grime]
 - j. Lime[scale]
 - k. Mineral Deposits
 - l. [Soap Scum] [&] [and] [Stains]
 - m. Toilet Ring[s]
 - n. [Toilet] Rust

Optional General / Cleaning Claims for front or back panel (Continued)

- o. [Hard] Water Deposits
- p. Cleans [Garbage] [Trash] Can[s]
- q. Cleans Waste Receptacle[s]

82. {Approved Surfaces for Disinfecting, Sanitizing and Cleaning:}

- a. [Bath] Tub[s]
- b. [Imitation] [Cultured] [Synthetic] Marble
- c. Bathroom [Sink] [Countertop] [Counter] [Tile] [Floors] [Fixtures] [Appliances]
- d. Sealed Fiberglass [Doors] [Shelves] [Surfaces]
- e. Glass
- f. Plastic Laminate [Formica®]
- g. Glazed [Ceramic] Tile
- h. Glazed Porcelain [Tile]
- i. [Hard Surface] [Glazed Tile] Floors
- j. Non-Food Contact
- k. Nonporous [Hard] [Solid] Surfaces
- l. Toilet[s] [(Inside And Outside)]
- m. [Glass] Shower[s] [Stalls] [Doors]
- n. Doorknobs
- o. Stainless Steel
- p. Sealed Granite

83. Locations for Disinfecting, Sanitizing and Cleaning:

- a. Medical [Clinics] [Facilities]
- b. Hospitals
- c. Healthcare [Facilities]
- d. Nursing Homes
- e. Health Clubs
- f. Industrial Facilities
- g. Institutions
- h. Manufacturing [Facilities] [Plants]
- i. [Hotels] [Motels]
- j. Office Buildings
- k. Prisons
- l. Correctional [Facilities] [Institutes]
- m. Public Transportation
- n. Day Care Facilities
- o. Schools
- p. Colleges
- q. Universities
- r. Sports Facilities

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MASTER LABEL

Highlighted text is new

EPA Reg. No. 64240-65

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WC Complete November 4, 2014

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Pg 9 of 9

Optional Miscellaneous:

Good Housekeeping Seal of Approval *(to be used only upon consent of this third party)*



“NSF Listed” *(to be used only upon consent of this third party)*



[KOSHER] [Kosher symbol of The Union of Orthodox Jewish Congregations]